

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8 999 18TH STREET - SUITE 300 DENVER, CO 80202-2466

JAN 5 2001



Ref: 8P-W-GW

<u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

Ms. Theresa Santangelo-Dreiling CDOT Project Manager State of Colorado Department of Transportation Office of Environmental Services 4201 East Arkansas Ave., Room 290 Denver, Colorado 80222

UNDERGROUND INJECTION CONTROL (UIC)

Class V Injection Well

Rule Authorization Modification

Remediation Site Pilot Test

CDOT Region 6 Headquarters Facility

(EPA File #CO5000-04976)

Dear Ms. Santangelo-Dreiling:

The proposed modification for another extension of the time-frame for the pilot test at the above site as requested by Harding Lawson ESE, in the behalf of CDOT during a phone conversation with Paul Weaverling on December 18, 2000, was reviewed by the Environmental Protection Agency (EPA) Underground Injection Control (UIC) Class V team. Based on our understanding of the contamination and the groundwater treatment strategy and our review of the analytical data provided in the report dated September 20, 2000, we believe this injection will not adversely impact ground water. For this reason, you may proceed with the plan and will not be required to operate under an UIC permit at this time. These following modifications to the original letter of Rule Authorization dated December 13, 1999, are as follows:

Re:

The time-frame for the pilot test will be extended for six (6) months beginning January 31, 2001, and remaining in effect through July 31, 2001. This time frame should allow remediation to continue for the purpose of maintaining the present nutrient plume and level of microbial activity that is currently decreasing the contaminant level within the plume until the final remediation strategy can be implemented. The pilot test is extended with the understanding that performance monitoring of the system will continue through the extended period of operation and the operating conditions are the same as those proposed in the Rule Authorization Modification request dated July 22, 2000.

Please note that further modification of this rule authorization will be required to expand this pilot test for the final remediation strategy at the site. At the time that proposed modification is submitted to EPA, please provide the most recent available monitoring information generated from this pilot scale test to allow us to evaluate the effectiveness of this remediation method and the behavior of the injection constituents, particularly nitrate, in the groundwater downgradient from the point of injection in both the upper and lower sandstone units.



Any change in operating methods or conditions as specified in your plan dated November 9, 1999, and the modification proposal dated July 22, 2000, must be approved in advance by the EPA. Please be advised that this rule authorization pertains to Underground Injection Control (UIC) solely and does <u>not</u> relieve you from satisfying the Colorado Department of Public Health. Nor is it the intent of this authorization to preclude any other federal, state or local regulations that may apply.

Please send all correspondence to:

U. S. Environmental Protection Agency Attention: Valois Shea MAIL CODE: 8P-W-GW-UIC 999 18th Street, Suite 300 Denver, CO 80202-2466

If you have any questions concerning this rule authorization or Class V regulations, policies, and guidance, please contact Valois Shea at (303) 312-6276.

Sincerely,

D. Edwin Hogle

Director

Ground Water Program

cc:

Paul H. Weaverling Harding Lawson Associates 707 17th Street, Suite 2400 Denver, CO 80202